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VIA ECF and FACSIMILE to (212) 805-4268

The Honorable Gabriel W. Gorenstein
Southern District of New York
500 Pearl Street
New York, New York 10007

Cameron S. Reuber
Partner
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Re: *Ritani, LLC v. Harout Aghjayan, et al.*
1:11-cv-08928 (RWS) (GWG)

Dear Judge Gorenstein:

My firm represents the Plaintiff in the above-referenced action. We write jointly with defense counsel to advise the Court that the parties were unable to resolve the outstanding discovery disputes. The parties request that a hearing be calendared at the court's convenience, ideally in February or March 2019, to address the outstanding discovery issues in this case. The parties propose a briefing schedule in advance of the hearing whereby Plaintiff will submit a letter brief thirty (30) days before the scheduled hearing and defendant will submit a responsive letter brief fifteen (15) days later. Both letter briefs will be 10 pages or less, exclusive of exhibits.

Plaintiff anticipates some of the exhibits to be filed will bear an "Attorneys-Eyes-Only" designation, which will require the filing to be made under seal. Wherefore, Plaintiff seeks leave of court to file the attachments to its letter brief under seal.

Thank you for Your Honor's consideration of this matter.

Respectfully submitted,



Cameron S. Reuber

cc: Counsel of Record (by ECF)